

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:) Chapter 11
)
MINING PROJECT WIND DOWN) Case 22-90273
HOLDINGS INC. and OFFICIAL)
COMMITTEE OF UNSECURED)
CREDITORS OF MININ,)
)
Debtor(s).)
)

**MOTION FOR WITHDRAWAL OF APPEARANCE AND REQUEST TO CEASE
SERVICE OF NOTICES, ORDERS, PLEADINGS, AND DOCUMENTS**

IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE ELECTRONICALLY AT [HTTPS://ECF.TXSBS.USCOURTS.GOV/](https://ecf.txsbs.uscourts.gov/) WITHIN TWENTY-ONE DAYS FROM THE DATE THIS MOTION WAS FILED. IF YOU DO NOT HAVE ELECTRONIC FILING PRIVILEGES, YOU MUST FILE A WRITTEN OBJECTION THAT IS ACTUALLY RECEIVED BY THE CLERK WITHIN TWENTY-ONE DAYS FROM THE DATE THIS MOTION WAS FILED. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOUOPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVINGPARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOTAGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVINGPARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THEMOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOUOPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUSTATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURTMAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

Liz Boydston hereby respectfully requests withdrawal of her appearance as counsel for the Interested Parties Alder BTC Holdings, LLC, Alder Opportunity, LP, and Alder SPV I, LLC (“Interested Parties”) in the above-captioned chapter 11 bankruptcy case.

The withdrawal would be limited to Ms. Boydston and would not impact the continued representation of Interested Parties by other attorneys for Interested Parties who have entered appearances in these proceedings. As such, the withdrawal of Ms. Boydston would not cause any disruption in this case.

Accordingly, pursuant to Local Rule 83.2, Ms. Boydston respectfully requests that the Court grant this motion and order the withdrawal of Ms. Boydston and remove her from applicable service lists, including the Court’s CM/ECF electronic notification list and the official service list.

Dated: September 14, 2023

Respectfully submitted,

GUTNICKI LLP

/s/ Liz Boydston

Liz Boydston
State Bar No. 24053684
10440 North Central Expressway
Suite 800
Dallas, TX 75231
(469) 895-4413
lboydston@gutnicki.com

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with counsel to Alder BTC Holdings, LLC, Alder Opportunity, LP, and Alder SPV I, LLC and counsel to the Committee regarding the relief requested herein. As of the time of the filing of this Motion, there was no objection by the Committee, but I had not received a response from counsel to the Debtor.

/s/Liz Boydston _____

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served, via the Court's ECF system to all parties authorized to receive electronic notice in this case on this 14th day of September 2023.

/s/Liz Boydston _____